

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ANN TOMKINS, as Personal Representative of the  
ESTATE OF FLORENCE TOMKINS, a  
Washington resident,  
Plaintiff,

v.

RELIASTAR LIFE INSURANCE COMPANY, a  
Minnesota corporation,  
Defendant.

Case No. 2:18-cv-01488-TSZ

JOINT STIPULATED MOTION  
AND ORDER TO EXTEND  
INITIAL DISCLOSURES  
DEADLINE BY ONE WEEK

Plaintiff Ann Tomkins, as personal representative of the Estate of Florence Tomkins (“Plaintiff”) and Defendant ReliaStar Life Insurance Company (“Defendant”), by and through their respective counsel of record, hereby respectfully submit this stipulated motion to extend by one week the deadline for the parties to exchange Initial Disclosures.

1. The Court’s October 18, 2018 Order Regarding Initial Disclosures, Joint Status Report, And Early Settlement (the “Initial Order”) set a December 31, 2018 deadline for (1) Initial Disclosures Pursuant to FRCP 26(a)(1), and (2) Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f).

2. On December 27, 2018, the Parties completed and filed their Combined Joint Status Report and Discovery Plan (the “Combined Report/Plan”). That Combined Report/Plan,

JOINT STIPULATED MOTION AND ORDER TO  
EXTEND INITIAL DISCLOSURES DEADLINE BY  
ONE WEEK - 1

Case No. 2:18-cv-01488-TSZ

FOSTER PEPPER PLLC  
1111 THIRD AVENUE, SUITE 3000  
SEATTLE, WASHINGTON 98101-3292  
PHONE (206) 447-4400 FAX (206) 447-9700

1 under the "Proposed discovery plan" heading, requested a one-week extension of the Initial  
2 Disclosures deadline set by the Initial Order due to the intervening holidays.

3 3. Ms. Tomkins and ReliaStar agree that good cause exists to extend the deadline for  
4 Initial Disclosures by one week, to January 7, 2019.

5 4. Pursuant to LCR 7(d)(1) and LCR 10(g), Ms. Tomkins and ReliaStar hereby  
6 stipulate and agree and that the deadline for Initial Disclosures should be extended until  
7 January 7, 2019, and respectfully request that the Court grant the subjoined Order extending the  
8 Initial Disclosures deadline to January 7, 2019.

9 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

10 DATED this 28<sup>th</sup> day of December, 2018.

11  
12 s/Bradley W. Hoff

13 Bradley W. Hoff, WSBA No. 23974  
14 John (Jack) P. Zahner, WSBA 24505  
15 Adam J. Chambers, WSBA #46631  
16 FOSTER PEPPER PLLC  
17 1111 Third Avenue, Suite 3000  
18 Seattle, WA 98101  
19 [bradley.hoff@foster.com](mailto:bradley.hoff@foster.com)  
20 [jack.zahner@foster.com](mailto:jack.zahner@foster.com)

21 *Attorneys for Plaintiff*  
22 *Ann Tomkins, as Personal Representative of the*  
23 *Estate of Florence Tomkins*  
24  
25  
26

JOINT STIPULATED MOTION AND ORDER TO  
EXTEND INITIAL DISCLOSURES DEADLINE BY  
ONE WEEK - 2

Case No. 2:18-cv-01488-TSZ

FOSTER PEPPER PLLC  
1111 THIRD AVENUE, SUITE 3000  
SEATTLE, WASHINGTON 98101-3292  
PHONE (206) 447-4400 FAX (206) 447-9700

1 *s/John T. Bender*

2 Emily J. Harris, WSBA No. 35763  
3 John T. Bender, WSBA No. 49658  
4 CORR CRONIN LLP  
5 1001 Fourth Avenue, Suite 3900  
6 Seattle, WA 98154  
7 (206) 625-8600  
8 [eharris@corrchronin.com](mailto:eharris@corrchronin.com)  
9 [jbender@corrchronin.com](mailto:jbender@corrchronin.com)

10 Clark C. Johnson (Pro Hac Vice)  
11 Michael T. Leigh (Pro Hac Vice)  
12 Kaplan Johnson Abate & Bird LLP  
13 710 W. Main Street, 4th Floor  
14 Louisville, KY 40202  
15 (502) 416-1630  
16 [cjohnson@kaplanjohnsonlaw.com](mailto:cjohnson@kaplanjohnsonlaw.com)  
17 [mleigh@kaplanjohnsonlaw.com](mailto:mleigh@kaplanjohnsonlaw.com)

18 *Attorneys for Defendant ReliaStar Life Insurance*  
19 *Company*

20  
21  
22  
23  
24  
25  
26  
JOINT STIPULATED MOTION AND ORDER TO  
EXTEND INITIAL DISCLOSURES DEADLINE BY  
ONE WEEK - 3

Case No. 2:18-cv-01488-TSZ

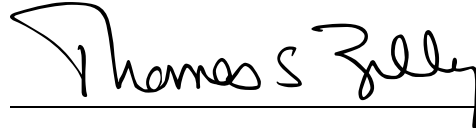
53249765.1

FOSTER PEPPER PLLC  
1111 THIRD AVENUE, SUITE 3000  
SEATTLE, WASHINGTON 98101-3292  
PHONE (206) 447-4400 FAX (206) 447-9700

**ORDER**

IT IS SO ORDERED. The deadline for Initial Disclosures Pursuant to FRCP 26(a)(1) shall be extended to January 7, 2019.

DATED this 7th day of January, 2019.



Thomas S. Zilly  
United States District Judge

Jointly Presented by:

s/Bradley W. Hoff

Bradley W. Hoff, WSBA No. 23974

John (Jack) P. Zahner, WSBA No. 24505

Adam J. Chambers, WSBA #46631

FOSTER PEPPER PLLC

1111 Third Avenue, Suite 3000

Seattle, WA 98101

[bradley.hoff@foster.com](mailto:bradley.hoff@foster.com)

[jack.zahner@foster.com](mailto:jack.zahner@foster.com)

*Attorneys for Plaintiff*

*Ann Tomkins, as Personal Representative of the Estate of Florence Tomkins*

s/John T. Bender

Emily J. Harris, WSBA No. 35763

John T. Bender, WSBA No. 49658

CORR CRONIN LLP

1001 Fourth Avenue, Suite 3900

Seattle, WA 98154

(206) 625-8600

[eharris@corrchronin.com](mailto:eharris@corrchronin.com)

[jbender@corrchronin.com](mailto:jbender@corrchronin.com)

Clark C. Johnson (Pro Hac Vice)

Michael T. Leigh (Pro Hac Vice)

Kaplan Johnson Abate & Bird LLP

710 W. Main Street, 4th Floor

Louisville, KY 40202

(502) 416-1630

[cjohnson@kaplanjohnsonlaw.com](mailto:cjohnson@kaplanjohnsonlaw.com)

[mleigh@kaplanjohnsonlaw.com](mailto:mleigh@kaplanjohnsonlaw.com)

*Attorneys for Defendant Reliastar Life Insurance Company*

JOINT STIPULATED MOTION AND ORDER TO  
EXTEND INITIAL DISCLOSURES DEADLINE BY  
ONE WEEK - 4

Case No. 2:18-cv-01488-TSZ

FOSTER PEPPER PLLC  
1111 THIRD AVENUE, SUITE 3000  
SEATTLE, WASHINGTON 98101-3292  
PHONE (206) 447-4400 FAX (206) 447-9700